

**Department of Agriculture**  
**Animal and Plant Health Inspection Service**  
**Docket No. 05-015-1**

**National Animal Identification System**

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United Producers, Inc. is a livestock marketing and financial services cooperative with primary operations in six states, including Ohio, Michigan, Indiana, Illinois, Kentucky, and Missouri. United Producers operates 19 auction markets and 23 collection points/buying stations. The multi species volume of livestock handled in 2004 was 3.45 million head.

United Producers, Inc. currently administers a wide variety of ID programs associated with the marketing of livestock. Indeed, we have been active users of ID procedures since our beginnings in the 1920's. We certainly support the concept of a national program to further enhance the livestock and meat industries.

The marketing sector will certainly be a "workhorse" of the proposed NAIS. With this broad assumption in mind we would like to focus on several issues that we view as having a major impact on how the proposed systems function for their intended use.

**Simplicity**

The general concept of keeping the necessary procedures as simple and straightforward as possible is highly important to us. We anticipate a well defined, easy to follow set of procedures and rules that our employees can implement with minimal confusion. For the most part our employees are not highly trained in computer applications and exotic data manipulation. End of the day submission of data generated within our systems must allow us to access the NAIS database with confidence and accuracy.

## **RFID Tags**

We generally support the use of RFID tags where applicable as a consistent device from which to generate accurate and accountable data. It is highly important that approved ID devices are as standardized as possible. The marketing sector will look to tag companies and suppliers that offer easy to administer, reliable, and sustainable devices.

## **Equipment Reliability**

It is our belief that the available technology (readers, scanners, computer application, etc) falls far short of what is needed by our markets to operate at the normal speed of commerce, particularly in a multi species auction setting. We obviously are aware that much of the equipment available can function for its intended use under controlled laboratory conditions, however, the marketing sector will need to install and use the equipment under vastly different conditions and environments. Our experience to date using available technology in markets gives rise for great concern.

## **Equipment Cost**

The marketing sector has great concern about the funding of the NAIS. We fully realize that in order for the markets to comply with the developing standards for ID, a substantial capital expenditure will need to be made to make the markets compliant. In many cases the “cost to comply” will be a major burden for owners and operators involved. We certainly do not want to install necessary equipment only to see it obsolete in a short period of time requiring additional updates and costly renovation.

## **Database (Public or Private)**

As earlier mentioned United Producers operates over a wide geographic area. The private database systems as put forth could involve numerous participants on a regional, species, or equipment employed basis. The marketing sector certainly does not want to have a myriad of companies or private database providers to put our employees in the position at the end of the day to determine “what data goes where” and “who gets what data”. We see a significant advantage in having a central governmental database with simple, unquestioned “where to send the data” procedural steps to comply. We also visualize that those parties needing to access the data, namely state veterinarians and federal officials, could possibly do so in a more efficient manner with a central governmental repository of data.

## **Identification Device Application Sites**

Given the enormous variation in the ability of livestock owners to officially identify their own livestock, we see a substantial need for market managers to assist in the ID device

application process. The absence of safe effective equipment on the farm, to install ID devices especially with the bovine species, leads us to believe that the markets must be allowed to assist. This would lead to greater data accuracy and more reliable application of devices.

### **NAIS (The Need is Now)**

Animal agriculture is under constant pressures from the public to respond to a host of demands and requirements. We view the need for mandatory animal identification at all levels to be highly significant in the future success of animal agriculture. We would encourage the USDA and the Congress to embrace more of a sense of urgency in implementing the NAIS system by concentrating on funding and adapting the system to meet the needs of the future. Finally, we appreciate that USDA APHIS chose to reach out to the species work groups to assist in designing a functional system. United Producers participation with the species work groups continues to be focused on providing a strong future for animal agriculture and the marketing sector.